

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

John Panico and Patricia Panico,) Civil Action No. 2:25-cv-03181-DCN
)
Plaintiffs,)
)
v.)
)
Joshua Marro)
)
Defendant.)
)

)

**DEFENDANT'S FIRST SET
OF REQUESTS FOR PRODUCTION
TO PLAINTIFFS**

TO: KELSEY E. SAALMANN, ESQUIRE, ATTORNEY FOR PLAINTIFFS:

Pursuant to Rule 34 of the South Carolina Rules of Civil Procedure, the above-named Defendant, Joshua Marro, requests that the above-named Plaintiffs produce the documents hereinafter described and permit the Defendant and his attorneys to inspect and copy such of them as they may desire. The Defendant requests that the documents be made available for this inspection at the office of The McKay Law Firm, P.A., 3700 Forest Drive, Suite 404, Columbia, South Carolina, or at such other location as can be agreed upon, during normal business hours.

This Request is intended to cover all documents in the possession of the Plaintiff or subject to Plaintiffs' custody or control.

As used in this Request, the term "document" means without limitations, the following items, whether printed or recorded or reproduced by any mechanical process, or written or produced by hand: Agreements, communications, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations

or interviews, diaries, graphs, reports, notebooks, note charts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, opinions or reports of physicians, opinions or reports of engineers, photographs, motion picture films, medical records, hospital records, pharmaceutical records, brochures, pamphlets, advertisements, circulars, press releases, drafts, letters, canceled checks, ledgers, journals, and all other writings.

The documents covered by this Request are as follows:

This Request is intended to cover all documents in the possession of the Plaintiff or subject to Plaintiff's custody or control.

As used in this Request, the term "document" means without limitations, the following items, whether printed or recorded or reproduced by any mechanical process, or written or produced by hand: Agreements, communications, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, graphs, reports, notebooks, note charts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, opinions or reports of physicians, opinions or reports of engineers, photographs, motion picture films, medical records, hospital records, pharmaceutical records, brochures, pamphlets, advertisements, circulars, press releases, drafts, letters, canceled checks, ledgers, journals, and all other writings.

The documents covered by this Request are as follows:

- 1) All documents you contend will establish your claims of negligence against the Defendant.
- 2) All documents which the Plaintiff contends will establish Plaintiff's entitlement to

actual damages, including but not limited to doctor and hospital bills.

- 3) All documents, articles, texts and treatises that any expert witness plans to rely upon regarding Plaintiffs' allegations of negligence against Defendant.
- 4) Any and all statements, reports, invoices, or other documents prepared by any expert witness retained by Plaintiffs.
- 5) Copies of all medical literature relied upon by Plaintiffs' expert witness.
- 6) Copies of all regulations, standards, manuals texts, journals or other documents or publications which Plaintiffs may use in direct examination or cross-examination of any witnesses or offer into evidence at deposition or at trial.
- 7) If Plaintiffs are claiming lost wages or loss of earning capacity, please produce copies of all tax returns from 2020 to present.
- 8) Copies of any application for any disability insurance benefits of any type, including but not limited to social security disability, short-term disability, long-term disability or other such policies
- 9) Copies of all medical records from any treating physicians whom John Panico and/or Patricia Panico has consulted, visited, conferred or been treated for any condition from 2015 to present.
- 10) All documents identified in Plaintiffs' Answers to Defendant's Interrogatories.
- 11) All written or recorded communications, including, but not limited to, correspondence, notices, memoranda, faxes, or any other documents, made or exchanged between Plaintiffs and any health care professional, doctor, medical examiner, and/or their agent(s) who examined the Plaintiffs or rendered an opinion as to the Plaintiffs' medical condition and/or cause of injury including, but not limited to, any medical report(s), and/or any other type of medical

death certificate and/or any other type of medical examination performed.

- 12) All documents relating to any medication prescribed for or taken by the Decedent during the five (5) years preceding his death.
- 13) Produce a hard copy of any social media posts, messages, photographs, documents, or other similar material from any social media site related to Defendant discovered or accessed by Plaintiffs, Plaintiffs' counsel or any member of Plaintiffs' counsel's staff.

This Notice to Produce is to be deemed continuing and is to be supplemented as additional documents described herein are located.

Respectfully submitted,



Julius W. McKay, II, Fed. ID No. 2674

Jacob A. Biltonft, Fed. ID No. 13787

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Attorneys for the Defendant

Columbia, South Carolina
June 10, 2025

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

John Panico and Patricia Panico,)	Civil Action No. 2:25-cv-03181-DCN
)	
Plaintiffs,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
Joshua Marro)	
)	
Defendant.)	
)	

The undersigned hereby certifies that on June 10, 2025, a copy of the foregoing *Defendant's First Set of Requests for Production to Plaintiff* were duly served on opposing counsel via **electronic mail** and/or U.S. Mail addressed as follows:

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Sherri A. Johnson, Paralegal to:
Julius W. McKay, II, Esquire
Jacob A. Biltoft, Esquire
The McKay Firm, P.A.